

May 12, 2011

Medford District BLM
3040 Biddle Road
Medford, OR 97504

Via email to Stephanie Kelleher
(Sent 5/23/11 – delayed)

Reference: Scoping comments for the Pilot Joe EA

Thank you for providing the opportunity to participate in and comment on this unique collaborative effort. My Scoping Comments are based on the objectives of the project, community meetings and field trips.

- 1.) Reducing stand densities – This objective will most likely be attained through the project. There is concern, however, that implementation (falling, skidding) will result in significant damage to leave trees. I have some concerns that the prescriptions are too much, given the terrain and soil conditions; I believe a few more trees, particularly in a variety of age classes, should be retained.
- 2.) Restore more characteristic structure and composition – I do not believe this objective will be realized. Current structure and composition are the result of prior harvest and are not “characteristic” for the stands I reviewed. This project can, however, lead to a more truly characteristic structure and composition if this objective is retained for future entry into the pilot stands. If the objective remains for the long-term, a more vibrant, resilient and productive forest will result.
- 3.) Accelerate development of structural complexity – While this project will undoubtedly provide development for larger tree structures, that goal alone will not enhance structural complexity. Again, the need is obvious to retain a somewhat larger number of trees in each unit, particularly a greater diversity of age class.
- 4.) Contribute to development of spatial heterogeneity – The process of falling trees will undoubtedly cause greater operational mortality than the prescribed markings would indicate. Spatial heterogeneity will not be achieved by the project’s current operational prescription, but by what results after initial harvest. To achieve that requires a greater diversity of age class than is currently marked.
- 5.) Community concerns about new road building seem to have been marginalized by the agency. The removal of units 27-1 and 34-2, as mentioned on the April 26 field trip, will allay some of those concerns. It is my opinion that the road in 32-1/32-4A is necessary and I am confident that the road will be temporary and

immediately decommissioned upon completion of work in those units. The only other new road would be unit 31-4A and that road should also be considered for temporary use and immediate decommissioning.

- 6.) There is an existing tension between resource management and resource utilization. Industry representatives are rightly concerned with maximizing the production values of the project while community concerns are more focused on the long-term impacts of the project across a broader (i.e., more than timber value) range of issues. The agency's role must be to balance these concerns, first and foremost under the primary mission of stewarding the resource for sustainability across generations. It is therefore necessary for the agency to first apply the known science and experiential knowledge for long-term management, then consider the more immediate concerns of various constituencies. To be truly effective, this pilot must reflect the necessary balance before the agency proceeds with similar applications of the management principles. Ongoing monitoring, as envisioned by the collaborative process, will provide the kind(s) of evaluation necessary to see how well this objective is met.
- 7.) During the field trips the marking indicated that numerous roadside trees would be included as part of the harvest. Removal of roadside trees has been shown to increase bank failure and erosion. Trees immediately adjacent to roads should be left whenever because they provide valuable stabilization to the road.

Thank you for the opportunity to submit these comments; I hope they have been helpful.

Sincerely,

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